

February 21, 2018

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: EB Docket No. 06-36
Annual CPNI Certification

Dear Ms. Dortch:

On behalf of our client, Reservation Telephone Cooperative, 499 Filer ID 803115, attached is the annual CPNI certification filing covering the year of 2017, pursuant to 47 C.F.R § 64.2009(e).

Sincerely,



Judy Christiansen
Consultant

cc: Reservation Telephone Cooperative

Attachment

Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: February 21, 2018
2. Name of company(s) covered by this certification: **Reservation Telephone Cooperative**
3. Form 499 Filer ID: **803115**
4. Name of signatory: Shane D Hart
5. Title of signatory: CEO/General Manager
6. Certification:

I, Shane D Hart, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI

The company represents and warrants that the above certification is consistent with 47. C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



Attachments: Accompanying Statement explaining CPNI procedures

RESERVATION TELEPHONE COOPERATIVE
STATEMENT OF COMPLIANCE and PROCEDURES
For the Year Ending 2017
Form 499 Filer ID: 803115

1. This Statement of Compliance for Reservation Telephone Cooperative ("Reservation" or "the Cooperative") is attached to and referenced within the Cooperative's 2017 Annual CPNI Certification.
2. Reservation has conducted CPNI training for all of its employees with special emphasis training for any employee that has access to CPNI. All employees have acknowledged their understanding of the requirements for the safeguarding of CPNI and the disciplinary actions that will be taken for the unauthorized access, breach, release, or usage of CPNI.
3. The Cooperative has and maintains copies of the FCC's CPNI Rules in addition to its own internal CPNI Policies and Guidelines (CPNI Manual). The CPNI Manual is fully compliant with FCC CPNI rules and must be reviewed and acknowledged by all Cooperative employees.
4. For the year ending 2017, Reservation is not aware of any incidence involving the access, breach, release, or usage of its CPNI by any unauthorized person or entity; i.e., data brokers or pretexters.
5. For the year ending 2017, Reservation has not received any customer complaints concerning the unauthorized access, breach, release, or usage of CPNI.